

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY

Caption in Compliance with D.N.J. LBR 9004-2(c)

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In Re:

Karen Prokapus

Case No. 16-14196MBK

Judge:

Chapter 13

CHAPTER 13 DEBTOR'S CERTIFICATION IN OPPOSITION TO

X CREDITOR'S MOTION or CERTIFICATION OF DEFAULT

TRUSTEE'S MOTION or CERTIFICATION OF DEFAULT

The debtor in the above-captioned chapter 13 proceeding hereby objects to the following
(choose one):

1. _____ Motion for Relief from the Automatic Stay filed by _____, creditor. A hearing has been scheduled for _____ at _____ a.m.

OR

_____ Motion to Dismiss filed by the Standing Chapter 13 Trustee. A hearing has been scheduled for _____ at _____ a.m.

OR

 X Certification of Default filed by The Bank of New York Mellon, creditor. I am requesting that a hearing be scheduled on this matter.

OR

_____ Certification of Default filed by Standing Chapter 13 Trustee. I am requesting that a hearing be scheduled on this matter.

2. I am objecting to the above for the following reasons (**choose one**):

_____ Payments have been made in the amount of \$_____, but have not been accounted for. Documentation in support is attached hereto.

OR

_____ Payments have not been made for the following reasons and debtor proposes repayment as follows (**explain your answer**):

OR

X Other: I made a payment on 9/29/2017 in the amount of \$1,100 and will make another payment of \$1,100 on 10/15/2017. I would like to resume regular monthly payments as of November 2017 and cure the balance of the arrears over six (6) months. I respectfully request that the movant's motion be denied so that I may cure the arrears and continue with my bankruptcy plan.

3. This certification is being made in an effort to resolve the issues raised by the creditor in its motion.

4. I certify under penalty of perjury that the foregoing is true and correct.

Date: 10/4/2017

/s/ Karen Prokapus, Debtor
Karen Prokapus, Debtor